

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

ALL VIP CARE INC. AND
LIZ VELAZQUEZ MCKINNON,

Defendants.

_____ /

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Plaintiff, Cruz Valdivieso Figuera, requests that the Court ask the following questions during its voir dire:

- ☐ Does anyone have their own business or has anyone had their own business at one time or another?
 - ☐ Where do you work?
- ☐ Does anyone here work as an independent contractor?
- ☐ Have any of you ever asked to be paid as an independent contractor instead of an employee?
- ☐ Is there anyone here who would have a problem applying United States federal law?
 - ☐ What about if you though Florida law suggested a different result, would you still be able to apply United States federal law?
- ☐ Does anyone currently work, or has anyone worked in home healthcare? [Nurse, Case Manager, CNA, Home Health Aide]
 - ☐ In what capacity?
- ☐ Has anyone here been owed money by their employer?
 - ☐ If so, explain the circumstances?
 - ☐ How was it resolved?

- ☐ Does anyone here get paid time and one-half for working overtime?
- ☐ Has anyone ever asked their employer about getting paid overtime or minimum wage?
- ☐ Does anyone here feel they should be getting paid overtime pay by their employer but is not being compensated for work that exceeds 40 hours?
 - Why?
- ☐ Does anyone believe that employees must be paid hourly to be entitled to overtime pay?
- ☐ Does everyone agree that disputes should be settled in court and not by parties taking matters into their own hands?
- ☐ What are your hobbies?
- ☐ What newspapers, television shows, or apps do you get your news from?

Dated this 29th day of October 2023.

s/Brian H. Pollock, Esq.
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